

		implemented.
- Add/Disc Essential Lines	3/1-4/1/97C	Pending definition of business scenarios and USOC/FID feature code mapping according to AT&T product priority list. <sup>1,4</sup>
- Add/Disc Additional Lines	3/1-4/1/97C	Development of this functionality is complete. SWBT is currently performing internal testing. <sup>1,4</sup>
- Directory Listing Changes	4/1/97C	Development of this functionality for straight line listings is complete. SWBT ready for internal testing for straight line listings. <sup>1</sup> EDI mappings for non-straight line listings have not been defined. AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Suspend/Restore Non-Payment	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3</sup>
- Suspend/Restore Vacation Svc.	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3</sup>
Records Only Order	4/1/97C	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3,4</sup>
T&F Order	4/1/97C	Development of this functionality is complete for T orders with a straight line directory listing. SWBT internal testing completed. Ready for testing by LSPs. <sup>2,3,4</sup> EDI mappings for non-straight line listings have not been defined.
<b>NON-POTS SERVICE ORDERS</b>		
PBX Trunks	6/1/97T	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>
DID Trunks	6/1/97T	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>2</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

Plexar	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Digiline/ISDN	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.
Semi-Public Phones	1/1/97C	SWBT internal testing completed for the line function. Ready for testing by LSPs. <sup>2,3,4</sup> SWBT USOC/FID mapping for additional feature codes in progress according to AT&T product priority list.
MegaLink (T1.5)	7/1/97T	Functionality is not achievable by target date. SWBT continues to be concerned about the difficulties of establishing an electronic interface which could support all the numerous codes required for this unique and extremely complex order type. SWBT handles this order type with manual, customer interactive processes. These processes should be used on LSP orders as well so that quality is assured and parity is maintained. AT&T and SWBT have agreed to mutually negotiate an implementation date for this functionality that may be beyond 6/1/97.

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where OBF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>2</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

<b>OTHER - SERVICE ORDER COMPONENTS</b>		
Multi-Line Hunting	4/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>
Preferential Hunting	3/1/97C	Documentation to define business scenarios and ordering requirements provided to AT&T 3/10/97. Pending review by AT&T. EDI mapping must be completed. <sup>1,4</sup>
Transfer of Calls - Network Intercept	1/1/97	Development of TFC functionality is complete. For Disconnect orders, SWBT internal testing is completed and SWBT is ready for testing by LSPs. <sup>1,3,4</sup> SWBT is currently performing internal testing for TFC functionality associated with Change and T&F orders.
Toll Billing Exception (alternatively billed calls)	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1,3,4</sup>
Handicap Services	1/1/97	Handicap services on Change orders and New Connect orders will be effective when those order types are implemented. SWBT USOC/FID mapping in progress according to the AT&T product priority list. <sup>1,4</sup>
ComCall	4/1/97C	Development of this functionality is complete. The SWBT USOC/FID mapping was completed 3/3/97. <sup>1,4</sup>
Future Expected Delivery Date (EDD)	4/1/97C	Development of this functionality is complete and available for any straight-line listing scenario.
Conversion When Final Bill Address Is Foreign PO	4/1/97C	Development of this functionality is complete. Ready for testing by LSPs. <sup>1,3</sup>

<sup>1</sup> "Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where ONF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

<sup>3</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

<sup>4</sup> SWBT and AT&T agreed on 2/6/97 to use SWBT USOC's and FIDs in lieu of incomplete national codesets. All additional features not previously mapped to feature codes will be defined by SWBT.

<b>DIRECTORY LISTINGS</b>		
<b>Directory Listing (Straight Line)</b>		
- White	2/1/97C	Development complete for straight line directory listings. Ready for internal SWBT testing. <sup>1</sup>
- Yellow	N/A	
<b>Directory Listing Other Than Straight Line</b>		
- White	2/1/97C	EDI mappings for non-straight line listings have not been defined. <sup>1</sup> AT&T and SWBT will mutually establish capabilities beyond straight-line testing outside of the implementation plan.
- Yellow	N/A	
<b>Directory Order Changes Prior to Publishing</b>		
- White	N/A	
- Yellow	N/A	
<b>Directory White Pages (Non-SWBT Areas)</b>	N/A	
<b>Directory Expedite</b>		

<sup>1</sup> On 2/6/97 additional requirements were identified for Bill-on situations. Programming is currently being reworked to accommodate these new requirements. Completion is pending receipt of documentation from AT&T for a new codeset on an existing EDI field.

- White	N/A	
- Yellow	N/A	
<b>POST SERVICE ORDER EDI TRANSACTIONS</b>		
Supplemental Orders		
Firm Order Confirmation (FOC)	4/1/97C	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.
Jeopardies	?	By 4/1/97, SWBT will provide missed appointment information via the EDI 855 transaction. SWBT is exploring the data available for jeopardy information. A manual process to provide the information by phone, when and where available, is contemplated.
Rejects	1/1/97	Development of this functionality is complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>1</sup>
Order Completion	1/1/97	Development of this functionality is complete. On 2/6/97 additional requirements were identified for Bill-on situations. Initial coding for Bill-on situations completed. SWBT internal testing in progress.

<sup>1</sup>"Ready for Testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where ONF/EDI standards have not been developed. SWBT is ready for testing and believes testing should be initiated prior to complete definition of available codesets.

**SWBT STATUS REPORT ON NEW ELECTRONIC INTERFACES  
FOR PRE-ORDER AND ORDERING AND PROVISIONING FUNCTIONS FOR UNBUNDLED NETWORK ELEMENTS<sup>1</sup>**

FUNCTION	SWBT AVAILABILITY	SWBT STATUS REPORT AS OF MARCH 15, 1997
		<b>UNBUNDLED NETWORK ELEMENTS</b>
<b>PRE-ORDER</b>		
	1/1/97	For Pre-ordering, the functionalities are the same as those developed for Resale, with the exception of due date and dispatch functionality. <sup>1</sup> That is, address verification, services/features availability, telephone number assignment, and customer service record (CSR) for non-complex services. As of 1/1/97, development of these functionalities were complete. SWBT internal testing completed. Ready for testing by LSPs. <sup>2</sup> Complex CSR functionality will be complete by 4/15/97, with enhanced development to provide additional fields by 5/1/97. The additional fields include IDENT, SA, LIST, SIC AND BILL.
<b>ORDERING</b>		
	6/1/97	SWBT has developed an EDI Interface to receive Local Service Requests (LSR) for Unbundled Network Elements (UNE). This interface also electronically responds to the LSP with acknowledgments (including error conditions if applicable), Firm Order Confirmations and Service Order Completion notices. Effective 1/2/97, SWBT is ready for LSP testing of this interface. SWBT's UNI

<sup>1</sup> SWBT continues to report separately for UNE, and is relying on the Commission's Order dated December 19, 1997 where it was confirmed that AT&T Exhibit 15A is applicable only to Resale, and that functionalities for UNE are developed separately.

<sup>2</sup> "Ready for testing by LSPs" means SWBT has performed internal system programming to establish electronic interface capability, and developed necessary data fields so that the EDI interface testing can begin between SWBT and the LSP. SWBT and AT&T are working to mutually develop requirements where ORF/EDI standards have not been developed. SWBT believes testing should be initiated prior to full requirements completion on a mutually agreeable schedule.

FUNCTION	SWBT AVAILABILITY	SWBT STATUS REPORT AS OF MARCH 15, 1997
		<b>UNBUNDLED NETWORK ELEMENTS</b>
		<p>EDI Interface is based on OBF/EDI national standards current with OBF definitions in final closure as of 1/2/97. This interface currently supports the ordering of the Local Loop, Local Loop with Interim Number Portability, Interim Number Portability, and Switch Ports for the following activity types: new connect, change, disconnect, inside move, outside move, records change, and conversion to new LSP.</p> <p>As a first step towards Operational Readiness Testing (ORT), SWBT provided AT&amp;T with LSR data element definitions currently supported by SWBT's EDI Gateway for Unbundled Network Elements on 1/29/97. On 3/12/97, SWBT provided AT&amp;T with a test plan to define ORT efforts. SWBT and AT&amp;T will meet 3/18-19/97 to begin discussion and clarification of SWBT UNE LSR documentation and the test plan.</p>

Exhibit ND-11  
6 Pages

**EXHIBIT ND-11**  
**AT&T RESPONSE TO**  
**SOUTHWESTERN BELL TELEPHONE COMPANY'S**  
**MARCH 17, 1997 STATUS REPORT**



**AT&T**

Thomas C. Palto  
Chief Regulatory Counsel

March 21, 1997

Suite 1500  
919 Congress Avenue  
Austin, Texas 78701-2444  
512 370-2010  
FAX: 512 370-2096

Ms. Paula Mueller  
Secretary of the Commission  
Public Utility Commission of Texas  
1701 N. Congress Avenue  
P. O. Box 13326  
Austin, Texas 78711-3326

Re: Docket No. 16226

Dear Ms. Mueller:

This letter responds to the Status Report on development of real-time electronic interfaces filed by Southwestern Bell Telephone Company (SWBT) on March 17. Suffice to say that the Commission's March 5 clarification had minimal effect (actually, no perceptible effect at all) on SWBT's report on the status of implementation of electronic interfaces for unbundled network elements (UNE). About the only meaningful information conveyed by SWBT's scant filing on UNE interfaces is that either AT&T or SWBT continues to misapprehend the Commission's Arbitration Award as far as the requirements and due dates for cooperative development and testing of real-time electronic interfaces for UNEs are concerned. As a result, information on specific interfaces, functionality and order types for UNE continues to be completely missing from SWBT's March 17 status report.

To briefly frame the continuing controversy, paragraph 25 of the Arbitration Award requires that SWBT "provide real-time electronic interfaces that allow LSPs to perform preordering, ordering, provisioning, maintenance and repair, and billing for resale services *and* unbundled network elements." Thus, SWBT is required to develop real-time, electronic interfaces for the same or at least comparable interfaces, functionalities and order types for UNE (e.g. migration orders, "as is" and "with changes") as the Commission required for resale. That has been AT&T's interpretation of the Commission's Award and also appears to have been the Commission's consistent interpretation.<sup>1</sup>

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<sup>1</sup> The specific functionalities and order types for resale are set forth with particularity in AT&T Exh. 15A. What the Commission did not require was the same set of interim due dates for unbundled elements and therefore rejected AT&T's proposed contract language, because it would have incorporated those dates. The Commission did not, however, change its prior ruling to require 15A functionality for UNE.

However, as the parties were in the process of drafting the February 28 joint status report, SWBT informed AT&T of its belief that the Award did not require SWBT to develop real-time electronic interfaces for the same or comparable interfaces, functionalities and order types for UNE as were provided for resale. On this basis, SWBT declined to work with AT&T to develop a joint report that would address the specific interfaces, functions and order types being developed for UNE. Instead, the parties simply flagged the disagreement and corresponding need for clarification in the February 28 report.

Fortunately, the issue of electronic interfaces for UNE was specifically acknowledged by the Commission and discussed at some length at its March 5 Open Meeting. Unfortunately, despite the Commission's March 5 "clarifi[cation] on the record" (Wood, 3/5 Tr. at 166), the requirements for UNE interfaces remain misperceived, or at best dimly perceived, by either AT&T or SWBT.<sup>2</sup> Consistent with the Award and the Commission's March 5 discussion, it remains AT&T's view that the joint implementation efforts and status reports for UNE interfaces should be at the same level of detail in terms of the specific interfaces, functionality and order types as is the case for resale interfaces. SWBT clearly disagrees and, as its March 17 report on UNE indicates, persists in its view that SWBT has no obligation to develop the same or comparable interfaces, functionalities and order types for UNE.

Because of the continuing disconnect on UNE interfaces,<sup>3</sup> further clarification appears necessary.<sup>4</sup> Otherwise, the divergent views will simply persist.

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<sup>2</sup> On March 5, Chairman Wood stated his understanding that by June 1 "the provisioning, ordering and preordering [for] unbundled network elements would also be operational." Tr. at 165. And there was 3-0 concurrence with Mr. Siegel's view, on behalf of OPD, that "the award stated it needed to be real-time, electronic interfaces [with similar] intervals." Tr. at 165-66. Copies of the relevant transcript pages are attached.

<sup>3</sup> Though there is no pun intended, SWBT's interpretation of the Award could be colored by its desire to disconnect customers served via UNE, even if no rearrangement of the physical serving arrangement is requested or necessary and where a purely software-based change is involved (as with migration orders involving the UNE platform).

<sup>4</sup> AT&T apologizes for not having Ms. Dalton available on March 5, which could perhaps have helped crystalize the issue and avoid the continuing confusion. On the other hand, it is not completely clear whether SWBT has chosen to simply disregard the March 5 clarification, disagrees as to its effect, or both. In any event, Ms. Dalton will be available for the next posting of this item on March 26.

Ms. Paula Mueller

Page 3

March 21, 1997

In sum, a process of joint development and cooperative testing is best calculated to produce a soft landing on June 1 and a joint report on June 13 which indicates that real-time electronic interfaces for UNEs work and that the relevant functionality and order types are available. The alternative is a crash landing on June 1 where SWBT presents an incomplete set of UNE interfaces that have not been cooperatively developed or tested and which therefore lack critical functionality. Interfaces for UNE that are operational (*i.e.* work to support rapid, broad-based entry) on June 1 is certainly what the Commission has stated it wants, but without the requested further clarification, that result is substantially jeopardized because UNE interfaces that do not support the relevant set of order types that LSPs can use to move customers are virtually worthless.<sup>5</sup>

Sincerely,



Thomas C. Pelto  
Chief Regulatory Counsel

cc: Ms. Kathleen Hamilton, Administrative Law Judge, PUC  
Ms. Carole Vogel, Director, Office of Regulatory Affairs, PUC  
Mr. Kevin Zarling, Assistant Director, Legal Division/ORR, PUC  
Mr. Stephen Davis, Director, Office of Policy Development, PUC  
Mr. Howard Siegel, Chief Attorney, Office of Policy Development, PUC  
Mr. Bill Magness, Chief Counsel, Office of Policy Development, PUC  
All Parties of Record to Consolidated arbitration proceedings (facsimile)

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<sup>5</sup> If SWBT is not required to work cooperatively with AT&T and other LSPs on the UNE interfaces, then the situation with EASE on the resale side will likely repeat itself, or worse. SWBT will unilaterally develop non-industry standard, proprietary interfaces, with missing or incomplete functionality. Moreover, bearing in mind SWBT's attempts to thwart UNE competition at every level (*e.g.* the licensing provision) and its tendency to spring last-minute surprises (*e.g.* new found non-recurring charges), the opportunities for mischief with the UNE interfaces are immense and the consequences drastic — LSPs will not be able to provide service to Texans using the UNE platform if they cannot pass migration orders. Of course, SWBT would prefer not only that the fox guard the henhouse, but also that it warm the eggs and herd the hatchlings.

1 MR. SIEGEL: For the record,  
2 this is Howard Siegel, Office of Policy  
3 Development.

4 The main problem here is that  
5 there is -- there appears to be an  
6 ambiguity or potential ambiguity in the  
7 arbitration award. We use the language "to  
8 the same interval Southwestern Bell  
9 performs for itself," and AT&T says you  
10 should treat unbundled the same kind of  
11 intervals that resale has, and Southwestern  
12 Bell's response is -- appears to be that  
13 they don't do unbundled elements for  
14 themselves and, therefore, the same  
15 intervals don't exist.

16 COMM. WALSH: Never is a  
17 good time?

18 (Laughter)

19 MR. SIEGEL: My  
20 understanding of the intent of the award  
21 was to require the same time periods that  
22 were being required for resale and that  
23 similar intervals were applicable, but that  
24 seems to be the one policy issue that the  
25 parties disagree on and are having

1 difficulty. Outside of that there appears  
2 to be a lot of cooperation between the  
3 parties and the rest of the operational  
4 interfaces.

5 CHAIRMAN WOOD: I mean I --  
6 I'm not sure if it was exactly the same as  
7 resale or not, but Exhibit 15 A or  
8 whatever, Nancy Dalton's exhibit -- I don't  
9 remember what it was; it had a life of its  
10 own -- had a chart. And there were a lot  
11 of dates on that chart. And it seemed to  
12 me the reason why we did the checkup  
13 hearing on June 13th was that not only were  
14 the resale things, most of which were front  
15 loaded this month and last month and in  
16 January were going to be done, was that the  
17 provisioning and ordering and reordering  
18 issues under unbundled network elements  
19 would also be operational. And so I don't  
20 know if any clarification of the award is  
21 needed, but, I mean, this deal has got to  
22 work. It can't be done by FAX and phone.

23 MR. SIEGEL: And the award  
24 stated it needed to be real time,  
25 electronic interfaces, and I think that

1 implies the quick time intervals that are  
2 necessary.  
3 COMM. WALSH: Do we need to  
4 do anything?  
5 CHAIRMAN WOOD: Do we need  
6 to clarify that somehow?  
7 MR. SIEGEL: I don't think  
8 so. If the Commission wants to state that  
9 their interpretation of the award, that  
10 generally the award stands for itself --  
11 CHAIRMAN WOOD: And we just  
12 clarified that on the record --  
13 COMM. GEE: Yeah.  
14 CHAIRMAN WOOD: -- with  
15 three nods.  
16 Anything else on this?  
17 Again I appreciate -- to me this  
18 is back of the tone of the original  
19 hearing, at least as to AT&T and Bell on  
20 the original hearing back in October. I  
21 appreciate that personally. I think I  
22 speak for the three of us saying we hope  
23 you both want to get into each other's  
24 business as bad as your marketing people  
25 say that you do on TV. I think that the



**Source Material  
Tab 19**

**DOJ Evaluation**

**Evaluation of the United States Department of Justice Before  
the Federal Communications Commission, CC Docket No. 97-  
121 (May 16, 1997)**

**This item is omitted from this collection of source materials  
because it is generally available or has been filed previously  
with or promulgated by the Commission.**